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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Robert Wright, Plaintiff, vs. Professional Claims Bureau, Inc., Defendant.	Docket No: **COMPLAINT** JURY TRIAL DEMANDED

Robert Wright (hereinafter referred to as "*Plaintiff*"), by and through the undersigned counsel, complains, states and alleges against Professional Claims Bureau, Inc. (hereinafter referred to as "*Defendant*"), as follows:

INTRODUCTION

1. This action seeks to recover for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, ("FDCPA").

JURISDICTION AND VENUE

2. This Court has federal subject matter jurisdiction pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d).

3. Venue is proper under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claim occurred in this Judicial District.

4. At all relevant times, Defendant conducted business within the State of New York.

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PARTIES

5. Plaintiff Robert Wright is an individual who is a citizen of the State of New York residing in Westchester County, New York.

6. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1692a(3).

7. On information and belief, Defendant Professional Claims Bureau, Inc., is a New York with a principal place of business in Nassau County, New York.

8. Defendant is regularly engaged, for profit, in the collection of debts allegedly owed by consumers.

9. Defendant is a "debt collector" as defined by 15 U.S.C. § 1692a(6).

ALLEGATIONS

10. Defendant alleges Plaintiff owes a debt ("the Debt").

11. The Debt was primarily for personal medical services and is therefore a "debt" as defined by 15 U.S.C. § 1692a(5).

12. Sometime after the incurrence of the Debt, at an exact time known only to Defendant, the Debt was assigned or otherwise transferred to Defendant for collection.

13. In its efforts to collect the debt, Defendant contacted Plaintiff by letter ("the Letter") dated January 5, 2017. (**"Exhibit 1."**)

14. The Letter was the initial communication Plaintiff received from Defendant.

15. 15 U.S.C. § 1692g(b) provides that if a consumer notifies the debt collector in writing within thirty (30) days of receipt of the initial communication that the debt, or any portion thereof, is disputed, the debt collector shall cease collection of the debt, or any disputed portion thereof, until the debt collector obtains verification of the debt or a copy of a judgment, and a copy of such verification or judgment is mailed to the consumer by the debt collector.

16. On January 18, 2017, Plaintiff advised Defendant by written letter that Plaintiff disputed the validity of the debt.

17. Defendant received Plaintiff's letter of dispute on January 23, 2017.

18. Defendant did not respond to Plaintiff's letter.

19. Defendant did not mail to Plaintiff verification of the debt or a copy of a judgment.

20. Instead Defendant sent Plaintiff two more collection letters dated February 7,

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2017, and March 14, 2017. (**"Exhibit 2"** and **"Exhibit 3,"** respectively.)

21. Defendant's failure to cease collections until it provided Plaintiff with verification of the debt violates 15 U.S.C. § 1692g(b).

JURY DEMAND

22. Plaintiff hereby demands a trial of this action by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment as follows:

a. Damages against Defendant pursuant to 15 U.S.C. § 1692k; and

b. Plaintiff's attorneys' fees pursuant to 15 U.S.C. § 1692k; and

c. Plaintiff's costs; all together with

d. Such other relief that the Court determines is just and proper.

DATED: May 6, 2017

BARSHAY SANDERS, PLLC

By: _/s/ *Craig B. Sanders* _____________
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